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EX PARTE MEMORANDUM

October 28, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 – 12th Street, S.W., Room TW-A325
Washington, DC 20554

Re: Promotion of Spectrum Efficient Technologies on
Certain Part 90 Frequencies, WT Docket No. 99-87

Dear Ms. Dortch:

On October 27, 2004, Christine McLaughlin, Esq., and Mr. Richard D. Dewey, Vice President – Engineering Services, on behalf of Metrocall Holdings, Inc. (Metrocall), and the undersigned, on behalf of the American Association of Paging Carriers (AAPC), met with Catherine W. Seidel, Deputy Chief, Wireless Telecommunications Bureau; Michael J. Wilhelm, Chief, Public Safety & Critical Infrastructure Division; Scot Stone, Assistant Chief, Public Safety & Critical Infrastructure Division; Nicole McGinnis, Legal Advisor, Wireless Telecommunications Bureau; and Zenji Nakazawa, Special Counsel, Public Safety & Critical Infrastructure Division, to discuss the petition for reconsideration filed jointly by AAPC, Metrocall and other representatives of the paging industry concerning the Second Report and Order and Second Further Notice of Proposed Rule Making in the above-referenced proceeding.

The discussion at the meeting reflected the position taken and arguments made by the paging industry in the joint petition for reconsideration that the paging industry should continue to be authorized for 25 kHz operation on Part 90 paging-only channels. Additionally, it was noted that a potential anomaly could arise, since the January 2005 cutoff for licensing new or modified 25 kHz systems has been stayed pending the Commission's decision on reconsideration, while the January 1, 2005 cutoff for authorizing new equipment for 25 kHz operation has not been stayed.

Any questions concerning this filing should be directed to the undersigned.

Respectfully submitted,

s/Kenneth E. Hardman

Kenneth E. Hardman

*Attorney for American Association of
Paging Carriers*

cc: Catherine W. Seidel
Michael J. Wilhelm
Scot Stone
Nicole McGinnis
Zenji Nakazawa